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December 7, 2015

Via ECF

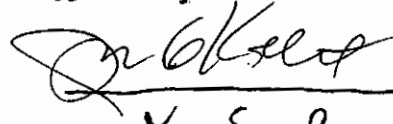
Hon. John G. Koeltl, United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

*A CONFERENCE WILL BE HELD
ON MONDAY, DECEMBER 14, 2015,
AT 11:30AM.*

Re: Brentlor v. Schoenbach, 1:13 Civ. 6697 (JGK)

SO ORDERED.

Your Honor,

12/9/15 
U S D J

My firm was recently retained as counsel for plaintiff Brentlor in the above-referenced matter. Judge Maas has, at least for the time being, resolved the dispute between my client and his former counsel, Mr. Sioris, over outstanding fees and Mr. Sioris's retaining lien. It is our hope that this matter will now progress toward a resolution.

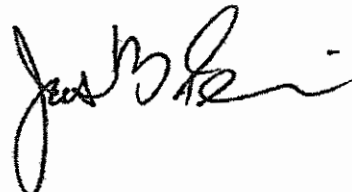
We believe that the issues might be streamlined, and possibly resolved, if we were to depose defendant Schoenbach. This would require Your Honor permitting a limited amount of discovery between the parties. Opposing counsel has indicated that he does not consent to the limited discovery that plaintiff is requesting, but if granted, opposing counsel has indicated to me that he would like to depose the plaintiff as well.

In the interest of judicial economy, we believe this would be time well spent because only defendant Schoenbach knows why he moved the funds from his escrow account in spite of his obligation to act as a gatekeeper for this transaction.

I am available to discuss this matter at the Court's and Mr. Brenner's convenience.

Very truly yours,

USDC SDNY
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DOC#
DATE FILED. 12-9-15



Justin B. Perri

cc: Allan L. Brenner, Esq. (via ECF and fax to 866-465-7230)